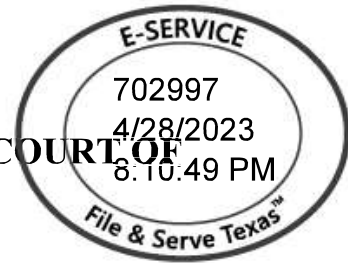


EXHIBIT C

CAUSE NO. 2020-67824



JANE DOE

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IN THE DISTRICT COURT OF

V.

HARRIS COUNTY, TEXAS

UBER TECHNOLOGIES, INC.
AND MANUEL ANTONIO
PORTILLO

125TH JUDICIAL DISTRICT

DECLARATION OF MATTHEW BAKER

1. My name is Matthew Baker, I am over the age of 18, I am of sound mind and body, and I am capable of making this Declaration. I am offering this Declaration in the above-captioned cause in support of Defendant Uber Technologies, Inc.'s ("Uber") Response in Opposition to Plaintiff's Motion to Compel.

2. I am a Senior Program Leader in Safety Support at Uber. I was first employed by Uber in July 2014 and have worked in safety support for the past seven years. In my position, I am responsible for ensuring that appropriate safety response procedures are in place. The facts set forth herein are based on my own personal knowledge and are true and correct.

3. I am familiar with and have reviewed the unredacted document that has been Bates-Labelled for purposes of this litigation as **DAVISUBER_PRLOG000262** (the "Zero Tolerance Policy Email"). I am also familiar with the circumstances surrounding its creation and communication. The Zero Tolerance Policy Email was created on or about April 2017 to facilitate the rendition of professional legal services to Uber, namely, to obtain legal advice from Uber's in-house counsel on proposed policy changes. The Zero Tolerance Policy Email contains correspondence from Uber's in-house legal counsel to other Uber employees detailing their impressions, thoughts, and advice with respect to the proposed policy.

4. I am familiar with and have reviewed the unredacted document that has been Bates-Labelled for purposes of this litigation as **DAVISUBER_PRLOG000480** (the "Proposed Policy Standard Report"). I am also familiar with the circumstances surrounding its creation and communication. The Proposed Policy Standard Report was created on or about August 2018 to facilitate

the rendition of professional legal services to Uber, namely, to obtain legal advice from Uber's in-house counsel on proposed policy changes. The Proposed Policy Standard Report contains findings and advice from Uber's in-house legal counsel's review of Uber's policies and procedures and was presented to other Uber employees.

My name is Matthew Baker, my date of birth is 10/12/1986 and my address is 1515 3rd St, San Francisco, CA 94158-2211. I declare under penalty of perjury that the foregoing is true and correct.

*Executed in Cook County, State of Illinois, on the **28th** day of April, 2023.*

Matthew Baker
Matthew Baker